

FILED
HARRISBURG, PA

MAR 01 2023

IN THE
UNITED STATES DISTRICT COURT PER Ida
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA DEPUTY CLERK

)	
George Ivan Lopez,)	Hon: Christopher C. Conner
Plaintiff,)	M.J. Karoline Mechalechick
Vs.)	
)	Case No: 3:21-cv-1819
John Wetze, et al.,)	
Defendants.)	

**PLAINTIFF GERALD WATKINS RESPONSE
TO DEFENDANTS INTERROGATORIES**

Plaintiff Gerald Watkins, response to the Defendants Interrogatories Dated January 25th, 2023 as received on February 3rd, 2023.

ANSWER

1. My Death Sentence has not been modified, vacated, or changed since its imposition in December of 1996.

2. Redundent, I already gave this information in an earlier filing.

3. Yes, it was throwed away by the Co's from SCI-Greene during a shakedown (cell-search) of the entire L-Block at SCI-Greene. I don't remember the exact date, but it happened After a sergeant from another Pennsylvania State Correctional Institution (SCI-Sumerset) was beaten to death by an inmate who stomped on him with timerland Boots. Which is why the Pa. DOC has banned inmates from having them. My Journal was thrown away during the shakedown.

4. As indicated in the Complaint, Plan to introduce Graig Haneys' Report as an, expert witness.

5. As indicated in the Complaint, Plan to introduce Graig Haneys' Report as an, expert witness

6. As indicated in the Complaint, Plan to introduce Graig Haneys' Report as an,

expert witness.

7. Redundant, I already gave this information in an earlier filing. In addition, I sent a number of request slips to the Psychologist and received no response.

8. Clothing, Food, personal hygiene products, photos, legal material, Television, watch, table lamp, tablet, footlocker etc.

9. Not Applicable.

10. Not Applicable.

11. Not Applicable.

12. Yes, I do not recall the exact date of each one.

13. Yes, I do not recall the exact date of each one.

14. Central office, Secretary John Wetzel.

15. Everything General Population can do *EXCEPT*, work in the hospital, kitchen (dictary) or correctional industrics jobs, making towels, undershirts, sweatsuits etc... DOC told me I can't have any of those jobs even though through the settlement from January of 2018. by John Wetzel and the Capital Case Attorneys, Capital Case Inmates were told they are entitled to everything General Population is.

16. Refer to the answer in number 15.

17. Objection, the Defendants have not turned over *discovery*.

18. The Defendants are in possession of said documents (*discovery*).

19. The Defendants are in possession of said documents (*discovery*).

20. Objection, attorney/client privilege.

RESPECTFULLY SUBMITTED

DATE: 2/25/2023



Gerald Watkins, DD-5212
1200 MOKYCHIC DRIVE
COLLEGEVILLE, PA. 19426

Defendants.

)

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X

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X

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Case No: 3:21-cv-1819

CERTIFICATE OF SERVICE

I, the undersigned hereby certify that on this 25th day of February, 2023, I have served a true and correct copy of the hereto attached respond to the Defendants innerrogatories, via First Class Mail, which service satisfy the Court requirements.

To: Ms. Kimberly Adams, ESQ.
1920 Technology Parkway
Mechanicsburg, Pa. 17050

P. W.

Geral Watkins, DD5212
1200 MOKYCHIC DRIVE
COLLEGEVILLE, PA. 19426

G. Watkins

Smart Communications/PADOC

SOI

Name

Number

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